

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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|                        |   |                                    |
|------------------------|---|------------------------------------|
| SUSAN PINSKY,          | : |                                    |
|                        | : |                                    |
| Plaintiff,             | : | 07 Civ. 3328 (CM) (HP)             |
|                        | : |                                    |
| - against -            | : |                                    |
|                        | : | <b>DEFENDANT'S RULE 26</b>         |
| JP MORGAN CHASE & CO., | : | <b><u>DISCLOSURE STATEMENT</u></b> |
|                        | : |                                    |
| Defendant.             | : |                                    |

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Defendant JPMorgan Chase Bank, N.A. ("the Bank" or "JPMorgan Chase"), incorrectly named herein as JP Morgan Chase & Co., by its attorney, JPMorgan Chase Legal and Compliance Department, Frederic L. Lieberman, Assistant General Counsel, as and for its disclosure pursuant to Fed. R. Civ. P. 26, asserts as follows:

A. The name and, if known, the address and telephone number of each individual, other than Plaintiff Susan Pinsky, likely to have discoverable information that the disclosing party may use to support its claims or defenses:

| <u>Name</u>      | <u>Address</u>   |
|------------------|--|
| Dee Lakhani      | c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815 |
| Migdalia Centeno | c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815 |
| Keith Swanson    | c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815 |

|                                     |  |
|-------------------------------------|--|
| Barbara Zimmer                      | c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815 |
| Cindy Chan                          | c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815 |
| The Hartford Life Insurance Company | Group Benefits, The Hartford, P.O. Box 2999, Hartford, Connecticut 06104-2999 (888) 747-8819                                     |

Dee Lakhani is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase Bank, N.A. during portions of the relevant time period, of some or all of the events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase Bank policies and procedures in effect during the relevant time period.

Migdalia Centeno is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase Bank, N.A. during portions of the relevant time period, of some or all of the events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase Bank policies and procedures in effect during the relevant time period.

Keith Swanson is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase Bank, N.A. during portions of the relevant time period, of some or all of the events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase Bank policies and procedures in effect during the relevant time period.

Barbara Zimmer is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase Bank, N.A. during portions of the relevant time period, of some or all of the events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase Bank policies and procedures in effect during the relevant time period.

Cindy Chan is likely to have knowledge of any requests by Plaintiff to JPMorgan Chase Bank, N.A.'s Health Services for consideration of her back condition, and actions taken by Health Services regarding such requests.

The Hartford Life Insurance Company is likely to have knowledge of Plaintiff's short-term and long-term disability leaves, coverage, and benefits.

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;
- Plaintiff's *accessHR* file, if any;
- Relevant documents and files, if any, maintained by any individual JPMorgan Chase Bank, N.A. manager or supervisor regarding Plaintiff;
- Relevant documents, data compilations, and files, if any, maintained by JPMorgan Chase Bank, N.A.'s Retail Financial Services' Home Equity unit concerning Plaintiff and/or JPMorgan Chase Bank, N.A.'s Retail Financial Services' Home Equity unit;
- Relevant documents and files, if any, maintained by JPMorgan Chase Bank, N.A.'s Human Resources Department concerning Plaintiff and/or JPMorgan Chase Bank, N.A.'s Retail Financial Services' Home Equity unit;
- Relevant documents and files, if any, maintained by JPMorgan Chase Bank, N.A.'s Health Services concerning Plaintiff;
- Relevant documents and files, if any, maintained by JPMorgan Chase Bank, N.A.'s Corporate Benefits Department concerning Plaintiff;
- Relevant documents and files, if any, maintained by JPMorgan Chase Bank, N.A.'s Corporate Secretary concerning Plaintiff;
- Relevant documents and files, if any, maintained by JPMorgan Chase Bank, N.A.'s Employee Relations Department concerning Plaintiff;
- Relevant JPMorgan Chase Bank, N.A. policies, plans, and programs;

- Relevant documents maintained by The Hartford Life Insurance Company concerning Plaintiff's short-term and long-term disability leaves; and
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format.

C. The provisions of Fed. R. Civ. P. 26(a)(1)(C) are not applicable because Defendant is not seeking damages at this time from Plaintiff.

D. Defendant is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement this response as appropriate.

Dated: June 4, 2007

**JPMORGAN CHASE LEGAL  
AND COMPLIANCE DEPARTMENT**

By: \_\_\_\_\_

Frederic L. Lieberman (FL 9454)

Attorneys for Defendant  
One Chase Manhattan Plaza, Floor 26  
New York, New York 10081  
(212) 552-1815

To: Arthur Z. Schwartz, Esq.  
Schwartz, Lichten & Bright, P.C.  
275 Seventh Avenue, Suite 1700  
New York, New York 10001  
(212) 228-6320

Attorneys for Plaintiff